



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

September 9, 2003

**CERTIFIED MAIL No. 7000 1670 0013 9129 4206**

Mr. Karl H. Kloepper, Secretary  
Kloepper, Inc.  
P.O. Box 840  
Paul, ID 83347

RE: AIRS Facility No. 777-00032, Kloepper, Inc., Portable  
Final Permit Letter

Dear Mr. Kloepper:

On August 25, 2003, the Department of Environmental Quality (DEQ) received a permit to construct (PTC) application from Kloepper, Inc. to reissue Tier II Operating Permit No. 777-00032 as a PTC with no increase in production, hours of operation, or allowable emissions. Based on review of the Tier II operating permit, IDAPA 58.01.01.200 through 228, and IDAPA 58.01.01.400 through 410, the DEQ finds this project meets the provisions of the *Rules for the Control of Air Pollution in Idaho*. Enclosed is PTC No. P-030421 for the portable hot-mix asphalt facility. This PTC replaces Tier II Operating Permit No. 777-00032, the terms and conditions of which no longer apply.

Kloepper, Inc. satisfied the PTC application fee requirement by submitting a PTC application fee of \$1,000 at the time the PTC application was submitted. No PTC processing fees are required, however, because there are no increases or decreases associated with this permitting action.

This permit does not release Kloepper, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

Stephen VanZandt of the Twin Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or [wrogers@deq.state.id.us](mailto:wrogers@deq.state.id.us).

Karl H. Kloepper  
September 9, 2003  
Page 2 of 3

Sincerely,

A handwritten signature in cursive script that reads "Martin Bauer".

Martin Bauer, Administrator  
Air Quality Division

MB/BR/br

Permit No. P-0304210

Enclosures



**Air Quality  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** P-030421

**AIRS FACILITY NO.:** 777-00032

**AQCR:** Portable

**CLASS:** SM80

**SIC:** 2951

**ZONE:** Portable

**UTM COORDINATE (km):** Portable

**1. PERMITTEE**  
Kloepfer, Inc.

**2. PROJECT**  
Portable Hot-Mix Asphalt Plant

**3. MAILING ADDRESS**  
P.O. Box 840

**CITY**  
Paul

**STATE**  
ID

**ZIP**  
83347

**4. FACILITY CONTACT**  
Karl H. Kloepfer

**TITLE**  
Secretary

**TELEPHONE**  
(208) 438-4525

**5. RESPONSIBLE OFFICIAL**  
Karl H. Kloepfer

**TITLE**  
Secretary

**TELEPHONE**  
(208) 438-4525

**6. EXACT PLANT LOCATION**  
Portable

**COUNTY**  
Portable

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Hot-mix asphalt production

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within five years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

  
**C. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** September 9, 2003

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

|                  |  |
|------------------|--|
| AIRS             | Aerometric Information Retrieval System  |
| AQCR             | Air Quality Control Region   |
| ASTM             | American Society for Testing and Materials   |
| CFR              | Code of Federal Regulations  |
| Department       | Department of Environmental Quality  |
| dscf             | dry standard cubic feet  |
| EPA              | U.S. Environmental Protection Agency   |
| gr               | grain  |
| gr/dscf          | grains per dry standard cubic foot   |
| hr/yr            | hours per year   |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer  |
| kW               | kilowatt   |
| lb/hr            | pound per hour   |
| O&M              | operations and maintenance   |
| PM               | particulate matter   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct  |
| SIC              | Standard Industrial Classification   |
| SM               | synthetic minor  |
| SO <sub>2</sub>  | sulfur dioxide   |
| T/day            | tons per day   |
| T/hr             | tons per hour  |
| T/yr             | tons per year  |
| UTM              | Universal Transverse Mercator  |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030421**

|                                 |                                    |                     |                   |
|---------------------------------|------------------------------------|---------------------|-------------------|
| <b>Permittee:</b> Klopfer, Inc. | <b>AIRS Facility No.</b> 777-00032 | <b>Date Issued:</b> | September 9, 2003 |
| <b>Location:</b> Portable       |                                    |                     |                   |

**1. PERMIT TO CONSTRUCT SCOPE*****Purpose***

- This PTC is for an existing portable hot-mix asphalt facility. This permit replaces Tier II Operating Permit No. 777-00032, issued January 12, 1998 (expired January 12, 2003), the terms and conditions of which no longer apply.

***Regulated Sources***

- Table 1.1 lists the sources of emissions regulated in this PTC.

**Table 1.1 REGULATED EMISSIONS SOURCES**

| <b>Source Description</b>                     | <b>Emissions Control(s)</b> |
|---|-----------------------------|
| CMI portable hot-mix asphalt plant – 550 T/hr | Baghouse                    |
| Electrical generator – 800 kW                 | None                        |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030423****Permittee:** Kloepper, Inc.**Location:** Portable**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

**2. EMISSIONS LIMITS****2.1 Hot-Mix Asphalt Dryer Stack Emissions Limits**

- Particulate matter emissions from the hot-mix asphalt dryer stack shall not exceed 0.04 gr/dscf.
- Sulfur dioxide emissions from the hot-mix asphalt dryer stack shall not exceed any corresponding emissions rate limit listed in Appendix A, Table 6.1.
- While operating in any PM<sub>10</sub> non-attainment area or proposed PM<sub>10</sub> non-attainment area, PM<sub>10</sub> emissions from the hot-mix asphalt dryer stack shall not exceed any corresponding emission rate limit listed in Appendix A, Table 6.2.

**2.2 Other Particulate Matter Emission Limits**

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from any stack, vent, or other functionally equivalent opening, shall not contain PM in excess of 0.04 gr/dscf.

**2.3 Opacity Limit**

Visible emissions shall not exceed 20% opacity as required in IDAPA 58.01.01.625.

**2.4 Visible Emissions Limits at Property Boundary**

Visible emissions emanating from all asphalt plant operations shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, 40 CFR 60, Appendix A, or a Department approved alternative.

**3. OPERATING REQUIREMENTS****3.1 Production Rate Limit**

The production rate of the hot-mix asphalt plant shall not exceed a maximum of 891,157 tons per any consecutive 12-month period (T/yr).

**3.2 PM<sub>10</sub> Non-attainment Area Production Rate Limit**

The production rate of the hot-mix asphalt plant, while located in any PM<sub>10</sub> non-attainment or proposed PM<sub>10</sub> non-attainment area, shall not exceed a maximum of 6,999 T/day.

**3.3 Air Stagnation Advisory Days**

No operation of the hot-mix asphalt plant shall occur during days of Air Stagnation Advisory.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030321****Permittee:** Kloepper, Inc.**Location:** Portable**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

**3.4 Burner Fuel**

The sulfur content of the burner fuel shall not exceed any of the following as required by IDAPA 58.01.01.727 and IDAPA 58.01.01.728:

- ASTM Grade 1 fuel oil – 0.3 percent by weight
- ASTM Grade 2 fuel oil – 0.5 percent by weight
- ASTM Grade 4, 5, or 6 fuel oil – 1.75 percent by weight

**3.5 Electrical Generator Set**

Operation of the electrical generator set shall not exceed a maximum of 1,620 hours per any consecutive 12-month period (hr/yr).

**3.6 Monitoring Equipment**

The permittee shall maintain and operate, in accordance with manufacturer's specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the baghouse.

**3.7 Pressure Drop Across Air Pollution Control Device**

The pressure drop shall be maintained within manufacturer's or O&M manual specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain on-site at all times and shall be made available to Department representatives upon request.

**3.8 Reasonable Control of Fugitive Emissions**

Emissions due to operations of the hot-mix asphalt plant, traffic on haul roads, traffic areas, and all aggregate handling equipment shall be reasonably controlled in accordance with IDAPA 58.01.01.651 and IDAPA 58.01.01.808.

Reasonable precautions may include, but are not limited to, the following:

- Use of water or environmentally safe chemicals;
- Application of dust suppressants;
- Use of control equipment;
- Covering of trucks;
- Paving; and
- Prompt removal of earth or other stored material from streets, where practical.



**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-0382****Permittee:** Kloepfer, Inc.**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

**Location:** Portable**4. MONITORING AND RECORDKEEPING REQUIREMENTS****4.1 Operations and Maintenance Manual Requirements**

Within 60 days after the issuance of this permit, the permittee shall have developed an O&M manual for the baghouse which describes the procedures that will be followed to comply with General Provision 2 and Permit Condition 3.6. This manual shall be kept onsite at all times and shall be made available to Department representatives upon request.

**4.2 Monitoring Parameters**

The permittee shall monitor and record the following information. Records of this information shall be kept onsite for the most recent 2-year period and shall be made available to Department representatives upon request.

- Hot-mix asphalt production in tons per month and tons per year;
- While located in any PM<sub>10</sub> non-attainment area or proposed PM<sub>10</sub> non-attainment area, the hot-mix asphalt production in tons per day;
- The ASTM grade of the fuel oil used in the burner;
- The pressure drop across the baghouse on a daily basis; and
- The electrical generator set operation in hours per month and hours per year.

**4.3 Reasonable Control Measures**

The permittee shall monitor and maintain records, during operation, of the periodic method(s) used to reasonable control emissions from the following: dryers; systems for screening, handling, storing, and weighing hot aggregate; systems for mixing hot-mix asphalt; and the loading, transfer, and storage systems associated with emissions control systems. The records shall also include the type of control used (e.g. water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used. The records shall be kept onsite for the most recent 2-year period and shall be made available to Department representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030421****Permittee:** Kloepfer, Inc.**Location:** Portable**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

**5. REPORTING AND RECORDKEEPING REQUIREMENTS****5.1 Reporting Requirements for Portable Equipment**

At least 10 days prior to relocation of any equipment covered by this permit, the permittee shall report to the Department, on relocation forms supplied by the Department, the following information:

- Exact location of the new site of operations;
- Start-up date at the new site of operations and the duration of operations at the new site;
- A scaled plot plan clearly showing the property boundary of the new site; and
- Equipment to be used at the new site or location.

**5.2 Certification of Documents**

All documents, including, but not limited to, application forms for PTC's, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications submitted to the Department shall contain a certification by the responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-05102****Permittee:** Klopfer, Inc.**Location:** Portable**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

**6. APPENDIX A****6.1 TABLE 6.1, SO<sub>2</sub> EMISSIONS RATE LIMITS****Klopfer, Inc.****Portable Hot-Mix Asphalt Plant****TABLE 6.1 HOURLY AND ANNUAL SO<sub>2</sub> EMISSIONS RATE LIMITS\***

| SOURCE DESCRIPTION | SO <sub>2</sub> |      |
|--------------------|-----------------|------|
|                    | lb/hr           | T/yr |
| DRYER STACK        | 117.9           | 99.0 |

- a. As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emission estimation methods used in the permit application analysis.

**6.2 TABLE 6.2, PM<sub>10</sub> EMISSIONS RATE LIMITS WHILE OPERATING IN A PM<sub>10</sub> NON-ATTAINMENT AREA OR PROPOSED PM<sub>10</sub> NON-ATTAINMENT AREA****TABLE 6.2 HOURLY PM<sub>10</sub> EMISSIONS RATE LIMIT\***

| SOURCE DESCRIPTION | PM <sub>10</sub> |
|--------------------|------------------|
|                    | lb/hr            |
| DRYER STACK        | 9.5              |

- a. As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emission estimation methods used in the permit application analysis.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030491**

|                                  |                                    |                     |                   |
|----------------------------------|------------------------------------|---------------------|-------------------|
| <b>Permittee:</b> Kloepfer, Inc. | <b>AIRS Facility No.</b> 777-00032 | <b>Date Issued:</b> | September 9, 2003 |
| <b>Location:</b> Portable        |                                    |                     |                   |

**7. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emissions testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required source test constitutes a violation. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test made available to the Department upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030421****Permittee:** Kloepper, Inc.**Location:** Portable**AIRS Facility No.** 777-00032**Date Issued:**

September 9, 2003

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to the department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.